

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR (FINAL) No. F-05-045 R3

SUMMIT POLYMERS, INC.

MOUNT STERLING, KY

MARCH 10, 2009

REVIEWED BY LUIS D. FUENTES

SOURCE I.D. #: 021-173-00024

SOURCE A.I. #: 3196

ACTIVITY #: APE20090001

**MINOR REVISION F-05-045 R3:**

On January 15, 2009, the Division for Air Quality (DAQ) received an application for a minor revision from the Summit Polymers, Inc. Mount Sterling facility for the addition of a paint booth. Emissions of particular matter (PM/PM10), volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from this machine were calculated based upon the highest percentage of each component from the two MSDSs for the coating compounds to be used at the process. The emission resulting from the addition of the paint booth will be 10 tons per year (tpy) of VOC, 1 tpy of PM/PM10, and less than 3 tpy of HAPs. The application was deemed complete on March 10, 2009.

**SOURCE DESCRIPTION:**

Summit Polymers is a manufacturer of small plastic parts for the automotive industry. Products include air conditioning/heating vent dampers and louvers, cup holders, etc. The source operates 30 injection-molding machines that produce the various automotive parts. These parts are then trimmed, inspected, and assembled. The mold "tree" and some rejected pieces and parts are then ground and recycled back through the molding system. Some of the parts, depending upon the desired final product, are sent to a series of nine (9) paint booths. Painted parts are cured in a small infrared oven attached to the paint booths.

The facility is classified as a conditional major source, and as such has accepted federally enforceable emission caps on VOC and HAPs to preclude the applicability of Title V permitting. Source-wide VOC emissions are limited to less than 90 tons per year, source-wide emissions of any individual HAP are limited to less than 9 tons per year, and source-wide emissions of all HAPs combined are limited to less than 22.5 tons per year.

**COMMENTS:**

The source is subject to the following applicable regulations:

1. 401 KAR 59:010, *New process operations*, applies to emissions of particulate matter (PM) from EP 02 and EP 03. The regrinders, EP 02, do not have the potential to exceed the applicable PM limits due to integrated controls. Total potential emissions of PM from the paint booths are less than the applicable PM limit before the filter controls are considered.
2. 401 KAR 63:020, *Potentially hazardous matter or toxic substances*, applies to the source

as a whole. Pursuant to this regulation, the source may be required to perform dispersion modeling of emissions of ethyl benzene, methyl ethyl ketone, styrene, toluene and xylenes from the facility to demonstrate that the non-carcinogenic effects are below the reference concentration (RfC) for chronic inhalation exposure.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

In order to preclude the applicability of Title V permitting, the source has requested source-wide caps to limit potential emissions to less than 90 tons per year of VOC, less than 9 tons per year for any single HAP, and less than 22.5 tons per year for combined HAPS.

Monthly emissions calculations are required for the source to demonstrate compliance with these emission caps. Permittee shall use less than 15,120 gallons per year, on a twelve month rolling basis, of 50% content HAP paint.

**PERIODIC MONITORING:**

N/A

**OPERATIONAL FLEXIBILITY:**

N/A

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.